New London Country Club

EXHIBIT 240

BUREAU OF WATER PROTECTION ASSOCIATION AS

Waterford, Connecticut Est. 1925

FEB 0 4 2010

February 2, 2010

Mr. Paul E Stacey
Department of Environmental Protection
Bureau of Water Protection & Land Reuse
Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127

Dear Mr. Stacey,

I am writing this letter in opposition of the proposed stream flow regulations put forth by the DEP. As a professional in the industry of turf grass, specifically golf course management, I am a steward of the environment and a conservationist at heart.

In my day-to-day actions as a golf course superintendent, I focus on providing members that belong to the country club with conditions conducive to the game of golf, while at the same time, striking a balance with nature. Our main objective is to insure that our actions at the country club promote life by fostering natural environments. Our use of IPM (Integrated Pest Management) in controlling pest problems insures that we have little to no impact on our surrounding environments; it also insures the survival of any and all beneficial species.

A large part of this IPM program is careful use of water. Our club recently installed a 1.1 million dollar irrigation system that allows us to precisely control the application of water to turf areas. The efficiency of this state of the art system has allowed us to completely stop the use of wells, thereby eliminating the club's effect on aquifers. I would like to see some collaboration of the turf grass industry and the DEP to recognize golf courses as re-charge sites rather than consumption sites. By our application of water during dry periods we are, in fact, preserving soil structure, sustaining plant life, and recharging aquifers.

The cost associated with conforming to the proposed regulations would be crippling to many golf courses in the State. These economic times have been devastating to many courses already and these regulations would do more harm than good.

I can not help but ask the question, if this 160 acre property is not a golf course, what would it be? It certainly would not be the open space, recreational, tax paying, habitat that it is today. Please consider the ramifications of these regulations and draft new regulations that help golf help the environment.

Respectfully submitted,

Daniel T Rogers

Golf Course Superintendent New London Country Club